

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

MARANDA LYNN O'DONNELL, et al.)	
)	
Plaintiffs,)	
)	
v.)	Case No. 16-cv-01414
)	(Consolidated Class Action)
HARRIS COUNTY, TEXAS, et al.)	The Honorable Lee H. Rosenthal
)	U.S. District Judge
Defendants.)	
)	
)	

**JOINT RESPONSE TO COURT ORDER, DKT. 398, BY TWO
DEFENDANTS, JUDGES 14 AND 16, AND PLAINTIFFS**

On June 1, 2018, this Court ordered the parties to confer on a revised preliminary injunction order. Dkt. 398. In response to that Order, the Plaintiffs, Defendant Judge of Harris County Criminal Court at Law No. 14, Michael Fields, and Defendant Judge of Harris County Criminal Court at Law No. 16, Darrell Jordan, jointly propose the order attached as Exhibit 1.

In February, prior to the Fifth Circuit's decision, Judge Fields and Judge Jordan began working with local stakeholders, including the Harris County District Attorney's Office and the Harris County Sheriff's Office, on revised injunctive provisions. Judges Fields and Jordan subsequently contacted Plaintiffs' counsel, and, although the Court had stayed proceedings, the parties continued working closely together to craft a revised injunction. The Fourteen Judges and the County declined to participate in that process.

In response to this Court's June 1 order, on June 5, 2018, Plaintiffs shared the agreed proposed revised injunction with the other Defendants. The Fourteen Judges responded on June 8 that they seek entry of the Fifth Circuit's sample provisions verbatim, as reflected in Exhibit

2. Defendants Harris County and the Hearing Officers responded on June 8 that they seek entry of the Fifth Circuit's sample provisions along with several changes, as reflected in Exhibit 3, to which the Fourteen Judges do not object.

The Court requested that the parties submit an agreed proposed modified order or a redline version showing provisions about which they disagree. Plaintiffs have reached a joint proposed order with two of the Defendants, Exhibit 1. A redline version comparing Exhibit 1 with the order proposed by the County (Exhibit 3) is attached as Exhibit 4. Because of the significant disagreements between the parties concerning basic principles of law, a meaningful redline version is not really feasible or instructive.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of June, 2018, I electronically filed the foregoing with the clerk of the court for the U.S. District Court, Southern District of Texas, using the electronic case filing system of the Court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

Elizabeth Rossi

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